

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

JACKSON HASZ,	)	CASE NO. 8:25-cv-398
	)	
Plaintiff,	)	
	)	
v.	)	<b>MOTION FOR</b>
	)	<b>PRELIMINARY INJUNCTION</b>
NATIONAL COLLEGIATE	)	<b>AND FOR EXPEDITED</b>
ATHLETIC ASSOCIATION,	)	<b>CONSIDERATION</b>
	)	
Defendant.	)	

COMES NOW Plaintiff Jackson Hasz and moves this Court for a Preliminary Injunction pursuant to Fed. R. Civ. P. 65. In support of the motion, Plaintiff states as follows:

1. Plaintiff Jackson Hasz (“Hasz”) has filed a Complaint for Injunctive Relief, in which he seeks an order from this Court permitting him to play college football during the upcoming 2025-2026 football season.

2. Defendant National Collegiate Athletic Association (“NCAA”) is an unincorporated association headquartered in Indianapolis, Indiana, and is thus a citizen of Indiana. As detailed in the Complaint for Injunction, the NCAA has unreasonably and unjustifiably withheld its consent to permit Hasz to play for the upcoming college football season. The NCAA’s withholding of this consent violates Section 1 of the Sherman Anti-Trust Act.

3. Hasz is likely to succeed in showing that the NCAA has violated the Sherman Anti-Trust Act, and that this violation is causing immediate and irreparable

injury to Hasz, and will continue to cause immediate and irreparable injury to Hasz if the Court does not issue a temporary restraining order and preliminary injunction.

4. The harm to Hasz outweighs any harm to the NCAA's legitimate interests that would be caused by the requested relief.

5. Granting a preliminary injunction will benefit the public.

6. Hasz has filed a brief in support of this motion contemporaneously herewith.

#### **REQUEST FOR EXPEDITED CONSIDERATION**

7. Hasz respectfully requests the Court hold an expedited hearing on his motion for preliminary injunction. Hasz seeks to play Division I college football for the upcoming football season. College teams will begin practicing in earnest for the upcoming season in July and August. A decision by the Court before August 1, 2025, will provide Hasz with an opportunity to join a college football program and participate in the upcoming season.

8. Hasz is in the process of serving Defendant, which should be completed by Tuesday, June 24, 2025. Hasz suggests the Court set a briefing schedule for this motion that will allow for the case to be submitted to the Court by the first or second week of July. Hasz suggests that the Court grant Defendant 7-days from the date of service to respond to this motion and grant Hasz 3-days thereafter to submit a reply brief.

WHEREFORE, Hasz respectfully requests this Court enter an order:

A. Declaring that (i) the NCAA's application of the Five-Year Rule, and to include time spent at Junior Colleges, violates the Sherman Act; and (ii) Hasz is eligible to compete at a Division I institution during the 2025-26 season;

B. Preliminarily enjoining the NCAA to immediately issue a waiver request to enable Hasz to compete at a Division I institution during the 2025-26 season;

C. Preliminarily enjoining the NCAA from enforcing the Five-Year Rule to include time spent at Junior Colleges;

D. Preliminarily enjoining the NCAA from enforcing the Rule of Restitution against Hasz and any institution for which Hasz plays intercollegiate athletics from complying with and/or relying on any injunctive order entered by this Court;

E. Consideration of the present motion on an expedited basis, as set forth herein; and

F. Any other relief the Court deems appropriate.

DATED this 23<sup>rd</sup> day of June, 2025.

JACKSON HASZ, Plaintiff

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